Fill in this information to identify the case:

Debtor1 Richard F. Vitale, Jr.

Document Page 1 of 3

Debtor 2 E (Spouse, if filing)

Erin B. Vitale

United States Bankruptcy Court for the : <u>WESTERN</u> District of <u>Pennsylvania</u>

(State)

Case number 16-24802-GLT

## Form 4100R

# **Response to Notice of Final Cure**

10/15

According to Bankruptcy Rule 3002.1(g), the creditor responds to the trustee's notice of final cure payment.

Pα	rt	4	

**Mortgage Information** 

Name of creditor: NewRez LLC d/b/a Shellpoint Mortgage Servicing

Last 4 digits of any number you use to identify the debtor's account: 3870

Property address: 54 GREEN CRESCENT DRIVE,

Number Street

WASHINGTON, PA 15301

City State ZIP Code

Part 2:

**Prepetition Default Payments** 

Check one:

- [X] Creditor agrees that the debtor(s) have paid in full amount required to cure the prepetition default on the creditor's claim
- [ ] Creditor disagrees that the debtor(s) have paid in full the amount required to cure the prepetition default on the creditor's claim. Creditor asserts that the total prepetition amount remaining unpaid as of the date of this response is:

\$\_\_\_\_

Court claim no. (if known): 12

#### Part 3:

#### **Postpetition Mortgage**

Check one:

[X] Creditor states that the debtor(s) are current with all postpetition payments consistent with § 1322(b)(5) of the Bankruptcy Code, including all fees, charges, expenses, escrow, and costs.

The next postpetition payment from the debtor(s) is due on:

6/1/2022 MM/DD/YYYY

[ ] Creditor states that the debtors are not current on all postpetition payments consistent with § 1322 (b)(5) of the Bankruptcy Code, including all fees charges expenses, escrow, and costs.

Creditor asserts that the total amount remaining unpaid as of the date of this response is:

- a. Total postpetition ongoing payments due:
- b. Total fees, charges, expenses, escrow and costs outstanding:
- c. Total. Add lines a and b.

Creditor asserts that the debtor(s) are contractually obligated for the postpetition payment(s) that first became due on:

(a) \$\_\_\_\_\_

+ (b) \$\_\_\_\_\_

(c) \$\_\_\_\_\_

MM/ DD/ YYYY

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Part 4:

Debtor 1

**Itemized Payment History** 

Middle Name

If the creditor disagrees in Part 2 that the prepetition arrearage has been paid in full or states in Part 3 that the debtor(s) are not current with all postpetition payments, including all fees, charges expenses, escrow, and costs, the creditor must attach an itemized payment history disclosing the following amounts from the date of the bankruptcy filing through the date of this response:

Last Name

- [X] all payments received;
- [X] all fees, costs, escrow, and expenses assessed to the mortgage; and
- [X] all amounts the creditor contends remain unpaid

Part 5:

Sign Here

The person completing this response must sign it. The response must be filed as a supplement to the creditor's proof of claim

Check the appropriate box:

[ ] I am the creditor.

[X] I am the creditor's authorized agent.

I declare under penalty of perjury that the information provided in this response is true and correct to the best of my knowledge, information, and reasonable belief.

Sign and print your name and your title, if any, and state your address and telephone number if different from the notice address listed on the proof of claim to which this response applies.

x /s/ Charles G. Wohlrab
Signature

Date 05/12/2022

Print Charles G. Wohlrab, Esq.

First Name Middle Name

Title Authorized Agent

Company Robertson, Anschutz, Schneid, Crane & Partners, PLLC

If different from the notice address listed on the proof of claim to which this response applies:

Address 130 Clinton Rd #202

Number

Sue

Fairfield, NJ 7004

State

ZIP Code

Last Name

Contact 470-321-7112

Email cwohlrab@raslg.com

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 18, 2022 , I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

Richard F. Vitale, Jr. 54 Green Crescent Drive Washington, PA 15301

Erin B. Vitale 54 Green Crescent Drive Washington, PA 15301

And via electronic mail to:

Christopher M. Frye Steidl & Steinberg Suite 2830 Gulf Tower 707 Grant Street Pittsburgh, PA 15219

Ronda J. Winnecour Suite 3250, USX Tower 600 Grant Street Pittsburgh, PA 15219

Office of the United States Trustee Liberty Center. 1001 Liberty Avenue, Suite 970 Pittsburgh, PA 15222

By: /s/ Jessica Norton

Email: jnorton@raslg.com